

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

# UNITED STATES OF AMERICA

V.

ANGEL OCASIO

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Cause No. EP-11-CR-2728-KC

## AFFIDAVIT OF WILLIAM S. WILTSE

Before me, the undersigned authority, personally appeared WILLIAM S. WILTSE,  
who, being by me duly sworn, deposed as follows:

"My name is WILLIAM S. WILTSE, I am over the age of 21 years, of sound mind, capable of making this affidavit, and have personal knowledge of the facts herein stated:

“1. I currently reside in Palm Beach County, Florida.

"2. I am a former police detective for the City of Salem, Oregon. I worked as a police officer in the State of Oregon for the past 18 years, during which time I conducted criminal investigations into the sexual abuse and exploitation of children. I am currently sworn as a reserve Deputy Sheriff with the Palm Beach County Sheriff's Office in Palm Beach County, Florida.

"3. I am employed by TLO, LLC, as its Security Director over Law Enforcement Systems. I am neither an officer nor a director of TLO, LLC.

"4. TLO is a private company located in Boca Raton, Florida, that provides software and databases for the law enforcement community and other private investigators.

“5. TLO also manages the licensing for, and access to, the CPS, which is an application developed by TLO to allow law enforcement officers around the world to track the use and distribution of child pornography online.

"6. The "source and object code" comprised within the CPS system and that of "any application called by the Child Protection System when executing" requested by the Federal Public Defender's office is extremely voluminous. At more than 4.7 million lines of code, it would be difficult for TLO to compile and virtually impossible for receiving parties to review prior to trial. This line count does not include source code for the proprietary database storage system designed by TLO.

"7. In addition to the programming code, the data accessed by the CPS system is also voluminous and extremely sensitive. The criminal lead data alone is in excess of ten billion records since collection began at TLO in 2009. There are currently more than 15 thousand active criminal investigations identified in CPS by investigators from around the world. Providing this information would not only compromise those investigations, but would also undermine CPS as an investigative tool for law enforcement.

I declare under criminal penalty of perjury that the foregoing is true and correct.

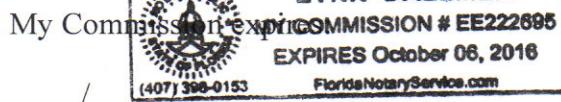
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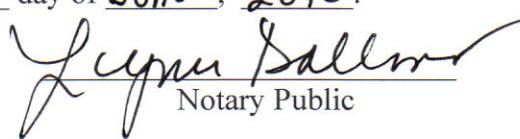
DATED this 3<sup>rd</sup> day of June, 2013.

  
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WILLIAM S. WILTSE

I, Lynn Dallmer, a Notary Public of the County and State aforesaid, hereby certify that William S. Wiltse personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this the 3<sup>rd</sup> day of June, 2013.



  
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Lynn Dallmer  
Notary Public